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Sable Offshore Corp.*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

CENTER FOR BIOLOGICAL
DIVERSITY, et al.,

Plaintiffs,

v.

DOUG BURGUM, et al.,

Defendants,

and

SABLE OFFSHORE CORP.,

Intervenor-Defendant.

CASE NO. 2:24-cv-05459-MWC-MAA

**SABLE OFFSHORE CORP.'S
RESPONSE TO FEDERAL
DEFENDANTS' NOTICE OF
RECENT DEVELOPMENTS**

Judge: Hon. Michelle Williams Court
Courtroom: 6A

1 Sable Offshore Corp. (“Sable”) has reviewed the Notice of Recent
2 Developments filed by Federal Defendants on May 23, 2025. It appears that the
3 Parties had a misunderstanding regarding the scope of the Office of State Fire
4 Marshal (“OSFM”) approval under the Plains Consent Decree. The Consent
5 Decree requires OSFM approval of restart for pipeline segments Lines 324 and 325
6 (formerly known as Lines 901 and 903) prior to returning Lines 324 and 325 to
7 service. Sable is following that requirement. (A copy of the Consent Decree,
8 including a map showing the location of Lines 901 and 903 – which are onshore –
9 is in Appendix A of the Consent Decree, available at:
10 [https://www.epa.gov/sites/default/files/2020-](https://www.epa.gov/sites/default/files/2020-03/documents/plainsallamericanpipelinelp.pdf)
11 [03/documents/plainsallamericanpipelinelp.pdf](https://www.epa.gov/sites/default/files/2020-03/documents/plainsallamericanpipelinelp.pdf).) The pipelines from the Santa
12 Ynez Unit Platforms to the Las Flores Canyon onshore processing facilities,
13 including the storage tanks, which are operationally required to be filled before
14 using Lines 324 and 325, are not covered by this Consent Decree requirement for
15 OSFM approval. As a result, statements made during briefing on the Federal
16 Defendants’ Motion for Voluntary Remand, including those outlined in Federal
17 Defendant’s filing and by Ms. Schneider for Sable at the hearing on March 21,
18 2025 regarding the steps necessary for production from the Santa Ynez Unit
19 inadvertently failed to take this nuance into account. On April 16, 2025, after the
20 hearing on the Federal Defendants’ Motion for Voluntary Remand, BSEE provided
21 a pre-production letter to Sable stating that all safety systems on Platform
22 Harmony have been successfully tested, as required by 30 C.F.R. § 250.800,
23 allowing Sable to return the facility to production.
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1 Dated: May 23, 2025

Respectfully submitted,

2 LATHAM & WATKINS LLP

3 By: /s/ Daniel P. Brunton

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